

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	:	
<u>ex rel.</u> THOMAS P. BURRIS,	:	
	:	<u>FILED UNDER SEAL</u>
Plaintiffs,	:	
	:	
v.	:	CIVIL NO. CCB-15-1443
	:	
THE SCRIPPS RESEARCH	:	
INSTITUTE,	:	
	:	
Defendant.	:	

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JOINT STIPULATED MOTION FOR ENTRY OF ORDER OF DISMISSAL

Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure and the *qui tam* provisions of the False Claims Act, 31 U.S.C. §§ 3729, *et seq.*, and in accordance with the terms and conditions of a Settlement Agreement fully executed September 10, 2020 among the United States, Relator Thomas Burris (referred to as “Relator”), and Defendant, The Scripps Research Institute, the United States and Relator stipulate, through their undersigned counsel, to the entry of an order (1) dismissing all claims in this action with prejudice as to Relator and the United States; and (2) providing that the Court retain jurisdiction over any disputes that may arise regarding the Settlement Agreement.

Relator, on behalf of himself, his heirs, successors, attorneys, agents, and assigns, stipulate and agree that the Settlement Agreement referenced above and the terms and conditions described therein are fair, adequate, and reasonable under all of the circumstances of this case, that he will not challenge the settlement pursuant to 31 U.S.C. § 3730(c)(2)(B), and that he expressly waives the opportunity for a hearing on any objection to the settlement under 31 U.S.C. § 3730(c)(2)(B).

The United States and Relator respectfully request that the Court enter an order in the form of the attached proposed order.

Respectfully submitted,

FOR THE UNITED STATES

Jeffrey Bossert Clark
Acting Assistant Attorney General

Robert K. Hur
United States Attorney

By: /s/ _____
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/s/

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FOR THE RELATOR THOMAS BURRIS

/s/

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/s/

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Certificate of Service

I certify that on September 22, 2020 a copy of the foregoing Notice of Joint Stipulation of Dismissal was sent by email to:

(1) Vincent McKnight, Esq., Sanford Heisler Kimpel, LLP, 1666 Connecticut Ave., N.W., Suite 300, Washington, D.C. 20009.

(2) Sherrie R. Savett, Esq., Joy P. Clairmont, Esq., and Russell Paul, Esq., Berger & Montague, P.C., 1622 Locust Street, Philadelphia, PA, 19103.

(3) Mark Allen Kleiman, Esq., Law Office of Mark Allen Kleiman, 2907 Stanford Ave., Venice, CA 90292.

/s/
Allen F. Loucks
Assistant United States Attorney